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6 Attorneys for Charles Edward Cooper Jr.

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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 CHARLES EDWARD COOPER JR.,
15 Defendant.
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2:14-cr-228-JAD-CWH

UNOPPOSED MOTION TO CONDUCT
A PRE-PLEA PRE-SENTENCE
INVESTIGATION REPORT AND
PROPOSED ORDER

17 COMES NOW the defendant, Charles Edward Cooper, by and through his attorney of record,
18 Heidi A. Ojeda, Assistant Federal Public Defender, and hereby files this Motion to Conduct a
19 Pre-Plea Pre-Sentence Investigation Report on Charles Cooper.

20 On July 1, 2014, Charles Edward Cooper (Mr. Cooper) was charged with Felon in Possession
21 of Firearm, in violation of 18 U.S.C. § 922(g). The parties believe there is a possibility that the
22 Defendant qualifies as an Armed Career Criminal based on preliminary criminal history information
23 that the parties are presently in possession of. Whether or not the Defendant is an Armed Career
24 Criminal will necessarily affect the outcome and disposition of the case and/or potential negotiations.
25 The parties are unable to definitively determine if the Defendant qualifies as an Armed Career
26 Criminal without knowing his entire criminal history and therefore a pre-plea Pre-sentence
27 Investigation Report is requested. Trial in this matter is set for January 27, 2015. For these reasons,
28 the parties respectfully request that a pre-plea PSR be conducted in this matter.

1 DATED this 26th day of August, 2014.

2 RENE L. VALLADARES
3 Federal Public Defender

4 /s/ Heidi A. Ojeda
5 HEIDI A. OJEDA
6 Assistant Federal Public Defender
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES EDWARD COOPER, JR.,

Defendant.

Case No.: 2:14-cr-228-JAD-CWH

ORDER

The reasons being sound, the parties being in agreement and the best interests of justice and judicial economy being served:

IT IS HEREBY ORDERED that the Probation Department prepare a pre-plea presentence investigation report for CHARLES EDWARD COOPER.

DATED _27th day of August, 2014.


UNITED STATES DISTRICT JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on August 26, 2014, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRE-SENTENCE INVESTIGATION REPORT AND PROPOSED ORDER**, by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
PHILLIP N. SMITH JR.
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101

/s/ Karen Meyer
Employee of the Federal Public Defender